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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion  
7 to File Under Seal (the “Administrative Motion”). The Administrative Motion seeks an order sealing  
8 highlighted portions of Defendant Otto Trucking’s Reply Supporting Its Motion to Compel Re:  
9 Waymo’s Investigation (“Otto Trucking’s Reply”), as well as the entirety of Exhibits 2-3 to the Boock  
10 Declaration.

11 3. Otto Trucking’s Reply (portions marked in red boxes in version filed herewith), Exhibit  
12 2 (portions highlighted in green in version filed herewith), and Exhibit 3 (entire document) contain,  
13 reference, and/or describe Waymo’s highly confidential and sensitive business information. Such  
14 information includes details regarding Waymo’s security measures and protocols, the scope of  
15 forensic investigations conducted, and detailed computer forensics regarding access to Waymo’s trade  
16 secrets. I understand that Waymo maintains this information as confidential. The public disclosure of  
17 this information would cause significant competitive harm to Waymo, as its security measures and  
18 computer forensics methods would become known to competitors who could use such information to  
19 Waymo’s disadvantage.

20 4. Waymo’s request to seal is narrowly tailored to those portions of Otto Trucking’s  
21 Reply and Exhibits 2-3 that merit sealing.

22  
23 I declare under penalty of perjury under the laws of the State of California and the United  
24 States of America that the foregoing is true and correct, and that this declaration was executed in San  
25 Francisco, California, on November 3, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor  
28 Attorneys for WAYMO LLC

**ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven  
Charles K. Verhoeven